

MEMO ENDORSED**LEVIN-EPSTEIN & ASSOCIATES, P.C.**

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December 29, 2023

Via ECF

The Honorable Jessica G. L. Clarke, U.S.D.J.
U.S. District Court, Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Brown et al v. CE Solutions Group, LLC et al*
Case No.: 23-cv-03029

Dear Honorable Judge Clarke,

This law firm represents Plaintiffs Darnell Brown, Jeremiah Jones, Ronald Turner, Terri Coleman, Phillip Barnes, Charles Shokanji, Joseph Miranda, Andres Reyes, Smithfuerte Reyes, Jadrien Smith, Melissa Thompson and Ticky Rowe (collectively, the “Plaintiffs”) in the above-referenced matter. This letter is submitted on consent of counsel for Defendants CE Solutions Group, LLC, CE Solutions Inc. and Jeannine Napoleone-Colbert (collectively, the “Defendants”).

Pursuant to Your Honor’s Individual Motion Practice Rules, this letter respectfully serves as a request to extend the parties’ deadline to submit a settlement agreement pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199, 200 (2d Cir. 2015), from January 5, 2024 to, through and including, January 12, 2024.

This is the fourth request of its nature. If granted, this request would not affect any other Court scheduled deadlines.

This letter further serves to request an adjournment of the virtual status conference scheduled for January 4, 2024, to, through and including a date and time set by the Court after January 10, 2024.

This is the first request of its nature. If granted, this request would not affect any other Court scheduled deadlines.

The basis of this request is that the undersigned counsel is in the process of scheduling conferences with Plaintiffs. The undersigned counsel anticipates being in a position to finalize these conferences within approximately one (1) week.

In light of the foregoing, it is respectfully requested that the Court: (i) extend the parties’ deadline to submit a settlement agreement pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199, 200 (2d Cir. 2015), from January 5, 2024 to, through and including, January 12, 2024; and (ii) adjourn the virtual status conference scheduled for January 4, 2024, to, through and including a date and time set by the Court after January 10, 2024.

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi

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Attorneys for Plaintiffs

VIA ECF: All Counsel

Application GRANTED. The conference scheduled for January 4, 2024 at 2:00 p.m. is hereby rescheduled to **January 11, 2024 at 2:00 p.m.** The settlement agreement remains due **January 15, 2024**. See ECF No. 58.

SO ORDERED.



JESSICA G. L. CLARKE
United States District Judge

Dated: January 2, 2024
New York, New York